

EXHIBIT

61

1 GIBSON, DUNN & CRUTCHER LLP.
2 Randy M. Mastro, Esq.
3 200 Park Avenue
New York, New York 10166
Telephone: (212) 351-4000

4 Attorneys for Anna Strasberg, Administrator C.T.A.

5
6 SURROGATE'S COURT
7 COUNTY OF NEW YORK

8
9 ACCOUNTING BY

10 MARJORIE M. FROSCH

11 EXECUTRIX OF THE ESTATE OF AARON
12 R. FROSCH, EXECUTOR

13 of the ESTATE OF MARILYN MONROE,

14 Deceased

FILE NO. P2781/1962

RECEIPT AND RELEASE

15
16 The undersigned, being of full age, sound mind and under no
17 disability, and entitled to receive the residue of the estate of the
18 above named decedent as successor Administratrix C.T.A. acknowledges
19 that Marjorie M. Frosch has fully and satisfactorily accounted for
20 all assets of the estate; and acknowledges receipt of money
21 transferred in the sum of \$33,904.18, plus interest in the sum of
22 \$469.48, for a total of \$34,373.66. The undersigned releases and
23 discharges Marjorie M. Frosch from all liability for any and all
24 matters relating to or derived from the administration of the
25 estate; and authorizes the Surrogate to make and enter a decree
26 settling the account and fully releasing and discharging the
27 fiduciary named above as to all matters in these proceedings.

28 Exhibit 10

Date: 10.18.00

Anna Strasberg
Anna Strasberg,
Administratrix C.T.A.

STATE OF NEW YORK
COUNTY OF New York) ss.:

On 10.18, 2000, before me personally appeared

ANNA STRASBERG to me known and known to me to
be the person described in and who executed the foregoing Receipt
and Release and duly acknowledged the execution thereof.

Patricia Rosado
Notary Public
Commission Expires: 7.6.2001
(Affix Notary Stamp of Seal)

PATRICIA ROSADO
Notary Public, State of New York
No. 01RO5014712
Qualified in New York County
Commission Expires July 6, 2001

Name of Attorney: Randy M. Mastro, Esq. Tel. No. 212-351-4000

Address of Attorney: Gibson, Dunn & Crutcher LLP, 200 Park Avenue,
New York, NY 10166

20089510_1.DOC

MM-0002844

EXHIBIT

62

1 GIBSON, DUNN & CRUTCHER LLP
2 Randy M. Mastro, Esq.
3 200 Park Avenue
4 New York, New York 10166
5 Telephone: (212) 351-4000

6 Attorneys for Anna Strasberg, Administrator C.T.A.

7 SURROGATE'S COURT

8 COUNTY OF NEW YORK

9 ACCOUNTING BY

10 ANNA STRASBERG

11 AS ADMINISTRATOR C.T.A.

12 of the ESTATE OF MARILYN MONROE,

13 Deceased
14
15

FILE NO. P2781/1962

WAIVER OF CITATION AND CONSENT IN
ACCOUNTING, PETITION FOR JUDICIAL
SETTLEMENT, AND FOR OTHER ORDERS

16 The undersigned, as an authorized representative of The Anna
17 Freud Centre, being of full age, and sound mind, residing at the
18 address written below, having an interest in this proceeding, waives
19 the issuance and service of citation in this proceeding, and
20 consents to the submission of a decree settling the account and
21 granting other orders as filed and adjusted without further notice.
22 I have reviewed the accounting and supporting schedules and consent
23 to all distributions and disbursements set forth therein.

24 I acknowledge receipt of full copies of the Accounting of Anna
25 Strasberg, including the summary statement of account and supporting
26 schedules; and the Petition for Judicial Settlement of Final Account
27 of Administrator C.T.A. and For An Order Authorizing Petitioner to
28

1) Execute Limited Liability Agreement; 2) Establish and Operate Limited Liability Company; 3) Use Estate Assets to Establish Limited Liability Company; 4) Distribute Interests to Residuary Beneficiaries, 5) For Order Vacating Order to Compel Fiduciaries to Account; and 6) Discharge of Prior Executor.

11/15/00
Date

Steven B. Rosenfeld
Signature
On behalf of
Anna Freud Centre

1070 PARK AVE., NY, NY 10128
Street Address

25%
Interest

STEVEN B. ROSENFELD
Print Name

NEW YORK, NY 10128
City/Town/Village/State/Zip

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss.:

On NOVEMBER 15, 2000, before me personally appeared

STEVEN B. ROSENFELD to me known who duly swore to the foregoing instrument and who did say that he/she resides at 1070 PARK AVE., NY, NY 10128 and that he/she is a ATTORNEY-IN-FACT of The Anna Freud Centre; and that he/she signed his/her name thereto by order of the Board of Directors of said organization.

Amy Auerbach
Notary Public

Commission Expires:
(Affix Notary Stamp of Seal)

AMY AUERBACH
Notary Public, State of New York
No. 01AU4721548
Qualified in New York County
Commission Expires March 30, 2002

Name of Attorney: Randy M. Mastro, Esq. Tel. No. 212-351-4000

Address of Attorney: Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166

[Note: If you did not receive a copy of the full account from the petitioner or petitioner's attorney, you may request a copy.]

20087980_1.DOC

EXHIBIT

63

At the Chambers of the Surrogate's
Court held in and for the County of
New York, at 31 Chambers Street,
New York, New York, on the
19th day of June, 2001

P R E S E N T :

HONORABLE ~~MARY M. STRASBERG~~
EVE PREMINGER
Surrogate.

SURROGATE'S COURT
NEW YORK COUNTY
01 JUN 20 PM 3:32

In the Matter of the Judicial Settlement of the Account of the
Proceedings of ANNA STRASBERG, Administratrix C.T.A. of
the Estate of

File No. P.2781/1962

MARILYN MONROE,
Deceased.

DECREE ON A VOLUNTARY
FINAL ACCOUNTING AND
RELATED MATTERS

Anna Strasberg, as Administratrix C.T.A. of the Estate of Marilyn Monroe ("Petitioner"),
having filed a final account of the Petitioner's proceedings covering the period from July 20, 1989,
the date on which Letters of Administration C.T.A. were issued to Petitioner, through October 3,
2000, and Anna Strasberg having presented a petition ("Petition") duly verified the 18th day of
October, 2000, praying (i) for the judicial settlement of the account; and (ii) for authority to execute
the Limited Liability Company Agreement attached as Exhibit 4 to the Petition, the Supplement
thereto attached as Exhibit 5 to the Petition, the Assignment attached as Exhibit 6 to the Petition, the
Certificate of Formation attached as Exhibit 7 to the Petition, and any and all other documents
necessary to establish the limited liability company and register and/or qualify it in other
jurisdictions; and (iii) for authority to take all other necessary steps to establish and operate the
limited liability company, including registering and qualifying the limited liability company in one or
more other jurisdictions; and (iv) for authority to use estate assets for the purposes of establishing the
limited liability company and registering and qualifying it in one or more other jurisdictions; and
(v) for authority to transfer all assets of the estate to the limited liability company and distribute
membership interests in the limited liability company pro rata to the residuary beneficiaries as

1 follows: 75% to Anna Strasberg, as Executor of the Estate of Lee Strasberg, and 25% to the Anna
 2 Freud Centre; and (vi) for these estate proceedings to be closed;

3 AND there having been filed herein the Consents to Execution of Limited Liability Company
 4 Agreement and Related Matters of Anna Strasberg, as Executor of the Estate of Lee Strasberg, and
 5 the Anna Freud Centre;

6 AND a Citation having been issued on the 29th day of January, 2001, pursuant to statute
 7 directed to all interested parties in the proceeding, directing them and each of them to show cause
 8 before this Court on the 9th day of March, 2001, at 9:30 a.m. of that day, why such relief should not
 9 be granted;

10 AND said Citation having been duly served, on January 29, 2001, upon the following: Anton
 11 O. Kris and Anna Kris Wolff, pursuant to the Authorization of The Anna Freud Center, the
 12 Authorization of Anton O. Kris and the Authorization of Anna Kriss Wolff; Continental Insurance
 13 Company; and upon the Attorney General of the State of New York;

14 AND proof of service on all such parties having been filed with this Court;

15 AND the Attorney General of the State of New York having appeared by filing a Notice of
 16 Appearance on March 7, 2001;

17 AND this Court having examined the final account now finds the state and condition of the
 18 account to be stated and set forth in the following Summary Statement thereof made by this Court as
 19 judicially settled and allowed by it to be recorded and taken as part of this Order and Decree;

20 SUMMARY STATEMENT

21 The following is a Summary Statement of the final account of the Petitioner's proceedings
 22 covering the period from July 20, 1989 through October 3, 2000:

23 CHARGES:

24 Amount shown by Schedule "A"	
25 (Principal received)	\$ 34,373.66
26 Amount shown by Schedule "A-1"	
27 (Realized increases on principal)	0.00

1 Amount shown on Schedule "A-2"
2 (Income collected) 15,956,520.01

3 TOTAL CHARGES: \$15,990,893.67

4 CREDITS::

5 Amount shown on Schedule "B"
6 (Realized decreases on principal) \$ 0.00

7 Amount shown on Schedule "C"
8 (Funeral and administration
9 expenses) 636,180.06

10 Amount shown on Schedule "D"
11 (Creditors' claim actually paid) 0.00

12 Amount shown on Schedule "E"
13 (Distributions to legatees,
14 distributees, etc.) 15,353,243.17

15 TOTAL CREDITS: \$15,989,423.23

16 Balance on hand shown by
17 Schedule "F" \$1,470.44

18 AND it appearing that Petitioner having fully accounted for all monies and property of said
19 estate which have come into the hands of the Petitioner and the Summary Statement of the same
20 having been shown above, it is hereby

21 ORDERED, ADJUDGED AND DECREED that the Account of Anna Strasberg,
22 Administratrix C.T.A. of the Estate of Marilyn Monroe, covering the period from July 20, 1989 to and
23 including October 3, 2000 be and it is hereby judicially settled and allowed as filed; and it is further

24 ORDERED, ADJUDGED AND DECREED that the Petitioner is authorized to execute the
25 Limited Liability Company Agreement attached as Exhibit 4 to the Petition, the Supplement thereto
26 attached as Exhibit 5 to the Petition, the Assignment attached as Exhibit 6 to the Petition, the
27 Certificate of Formation attached as Exhibit 7 to the Petition, and any and all other documents
28 necessary to establish the limited liability company and register and/or qualify it in other
jurisdictions, as the Petitioner deems appropriate; and it is further

1 ORDERED, ADJUDGED AND DECREED that the Petitioner is authorized to take all other
 2 necessary steps to establish and operate the limited liability company, including registering and
 3 qualifying the limited liability company in one or more other jurisdictions, as the Petitioner deems
 4 appropriate; and it is further

5 ORDERED, ADJUDGED AND DECREED that the Petitioner is authorized to use estate
 6 assets for the purposes of establishing the limited liability company and registering and qualifying it
 7 in one or more other jurisdictions, as the Petitioner deems appropriate; and it is further

8 ORDERED, ADJUDGED AND DECREED that the Petitioner is authorized to transfer all
 9 assets of the estate to the limited liability company and distribute membership interests in the limited
 10 liability company pro rata to the residuary beneficiaries as follows: 75% to Anna Strasberg, as
 11 Executor of the Estate of Lee Strasberg, and 25% to the Anna Freud Centre; and it is further

12 ORDERED, ADJUDGED AND DECREED that ~~upon complying with the~~
~~directions of this decree that the petitioner hereby shall be~~
 13 ~~discharged as to all matters and things contained in this~~
 14 ~~accounting and decree.~~
 15

16 
 17 SURROGATE

18 20118337_1.DOC

EXHIBIT

64

1 GIBSON, DUNN & CRUTCHER LLP
2 Randy M. Mastro, Esq.
200 Park Avenue
3 New York, New York 10166
Telephone: (212) 351-4000

4 Attorneys for Anna Strasberg, Administrator C.T.A.

5
6 SURROGATE'S COURT

7 COUNTY OF NEW YORK

8
9 VOLUNTARY FINAL ACCOUNTING AND
RELATED MATTERS BY

10 ANNA STRASBERG,

11 ADMINISTRATOR C.T.A. OF THE
12 ESTATE OF MARILYN MONROE,

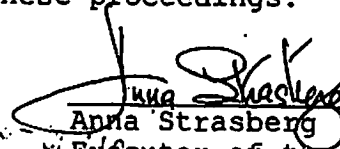
13 Deceased
14

FILE NO. P2781/1962

RECEIPT AND RELEASE

15 The undersigned, being of full age, sound mind and under no
16 disability, on behalf of the Estate of Lee Strasberg, a beneficiary
17 of the decedent's will entitled to receive 75% of the residue of the
18 estate, comprised of Marilyn Monroe LLC, acknowledges that Anna
19 Strasberg has fully and satisfactorily accounted for all assets of
20 the estate; and acknowledges receipt by assignment of a 75% interest
21 in Marilyn Monroe LLC. The undersigned releases and discharges Anna
22 Strasberg from all liability for any and all matters relating to or
23 derived from the administration of the estate; and authorizes the
24 Surrogate to fully release and discharge the fiduciary named above
25 as to all matters in these proceedings.
26

27 Date: 7/26/01


28 Anna Strasberg

Executor of the Estate of Lee Strasberg

EXHIBIT

65

Filed separately under seal pursuant to Protective Order

EXHIBIT

66

COPY

1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 -----x
4 SHAW FAMILY ARCHIVES, LTD.,
5 EDITH MARCUS, and META STEVENS

6 Plaintiffs,

7 - against -

8 CMG WORLDWIDE, Inc., an Indiana
9 corporation, and MARILYN MONROE,
liability company,

10 Defendants.
11 -----x

12 Ellen Grauer Court Reporters
13 126 East 56th Street
14 New York, New York

15
16 December 26, 2007
17 12:01 p.m.

18
19 30(b)(6) deposition of MARK
20 ROESLER, before Marlene Lee, CSR, CRR, a Notary
21 Public of the State of New York.

22
23 ELLEN GRAUER COURT REPORTING CO. LLC
24 126 East 56th Street, Fifth Floor
25 New York, New York
212-750-6434
Ref: 86257

1 ROESLER

2 A. I worked at -- I had just graduated
3 from law school and worked in the -- assisted
4 in the licensing of the copyrighted images of
5 Norman Rockwell.

6 Q. Just Norman Rockwell?

7 MR. MINCH: Objection.

8 A. Initially, yes.

9 Q. And did you have any specific
10 duties and responsibilities -- let me rephrase
11 that. When you say "assisted in the
12 copyrighting of images of Norman Rockwell,"
13 what do you mean by that?

14 MR. MINCH: Objection.

15 A. There was -- Curtis Publishing
16 Company owned 322 copyrights of Norman Rockwell
17 images that appeared in the Saturday Evening
18 Post. On the covers of the Saturday Evening
19 Post. And they licensed out the images to
20 those copyrighted images.

21 Q. And what did you do?

22 MR. MINCH: Objection.

23 A. There was a gentleman that was a
24 lawyer that ran that operation. And I assisted
25 him with reviewing contracts and negotiating

1 ROESLER

2 licensing agreements.

3 Q. How long were you employed at
4 Curtis Licensing?

5 MR. MINCH: Objection.

6 A. Well, Curtis Licensing at some
7 point in the ensuing years became Curtis
8 Management Group. We spun it off into a
9 separate company, of which -- which I owned an
10 interest in and later purchased the entire
11 interest of the company. And -- I'm sorry. I
12 forget what the specific question was.

13 Q. I'm just trying to get an
14 understanding of what your positions were
15 subsequent to graduating. You said you were at
16 Curtis Licensing since 1981. Subsequent to
17 that you stated you were at Curtis Management
18 Group. How long were you at Curtis Management
19 Group?

20 A. Well, Curtis Licensing folded into
21 Curtis Management Group, and that later became
22 CMG Worldwide. It was all kind of one and the
23 same.

24 Q. When did it become CMG Worldwide?
25 Let me rephrase. When did Curtis Management

1 ROESLER

2 Group become CMG Worldwide?

3 A. Sometime in the '80s. Maybe mid,
4 late '80s.

5 Q. And you mentioned that you had
6 purchased the entire group at one point in
7 time?

8 MR. MINCH: Objection.

9 MS. COLBATH: Objection.

10 A. I'm sorry.

11 MS. COLBATH: What is the question?

12 Q. You testified earlier you owned an
13 interest in and later purchased the entire
14 interest of the company. What did you mean by
15 that?

16 A. In 1981 when I started working, I
17 had a 20 percent interest in the -- in the
18 licensing operation, Curtis Licensing
19 Corporation, I think it was, and had an option
20 to purchase -- I had an option for that to
21 increase to 49 percent, and then an option to
22 purchase the entire amount. So it evolved over
23 the next five, six, seven years.

24 Q. When did you purchase the entire
25 amount of Curtis Licensing?

1 ROESLER

2 A. I -- I don't know that we took
3 specific action as a result of this letter.

4 Q. This document came from CMG's
5 files?

6 MS. COLBATH: Objection.

7 A. Did -- are you asking me?

8 Q. I'm asking you.

9 A. Like I said, I don't recall seeing
10 this letter. I don't think it came from our
11 files. I don't recall seeing it.

12 Q. A second ago you said it did.

13 MR. MINCH: Objection.

14 MS. COLBATH: Objection.

15 A. No, you asked me if I've ever seen
16 document 12. I said I've never seen the cover
17 letter, that I can recall. But I've seen it.
18 The second part of 12 got circulated, a fax
19 copy you'd see every once in a while. Your
20 question is, did this come from our files? I
21 don't think it did. I don't think it did.
22 It's possible there's something in our files I
23 don't recall, but --

24 MR. SERBAGI: If the court reporter
25 would mark as Roesler 13, bearing

1 ROESLER

2 production Nos. MM 0013310 through
3 13319.

4 (Roesler Exhibit 13 for
5 identification, document, written by M.
6 Roesler, 5-2-95, production Nos. MM
7 0013310 through 0013319.)

8 Q. Have you seen this document before,
9 Mr. Roesler?

10 A. It looks like I wrote it.

11 Q. When you refer to you wrote it, did
12 you write all of the pages that are contained
13 within Roesler 13?

14 A. I mean, at least to some extent.

15 Q. To the extent you didn't write it,
16 did you review it before it was sent to --

17 A. Yeah.

18 Q. -- Ms. Strasberg?

19 A. Yes.

20 Q. You would have made sure everything
21 in here is true and accurate?

22 A. I would.

23 Q. You wouldn't lie to Ms. Strasberg,
24 would you?

25 A. No.

1 ROESLER

2 Q. That's your signature on page 1?

3 A. It is.

4 Q. Dated May 2nd, 1995; correct?

5 A. Yes.

6 Q. What was the gist of what you were
7 trying to say in the first page of this
8 document to Ms. Strasberg?

9 MS. COLBATH: Objection.

10 A. I don't -- I don't recall. I don't
11 know what --

12 Q. If you could just read the first
13 page to yourself. Maybe it will refresh your
14 recollection.

15 MR. MINCH: I'm sorry. What

16 page --

17 A. You're asking what the recent legal
18 victory on the West Coast was?

19 Q. I'm just asking you to read the
20 cover page, this letter that you sent to
21 Ms. Strasberg, and tell me what the purpose of
22 this letter was.

23 A. Well, it was right before -- we
24 started representing the -- officially
25 representing the estate 90 days later, so it

1

ROESLER

2

attributes." Do you see that?

3

A. That's correct.

4

Q. There's a list of bullet points

5

underneath that. Do you see that?

6

A. Yes.

7

Q. And you wrote those bullet points;

8

correct?

9

A. I did.

10

Q. If you turn to the -- let's start

11

with the first bullet point. "Encompasses

12

protection of names, voices, signatures,

13

photographs, images, likeness, or distinctive

14

appearances, gestures, or mannerisms." Do you

15

see that?

16

A. Yes.

17

Q. Is that something that you wrote?

18

A. At least reviewed.

19

Q. True and correct?

20

A. I'm sorry?

21

Q. Strike that. Turning to the fourth

22

bullet point, you state -- if you'd read that

23

into the record.

24

A. I'm sorry? You want me to read it?

25

Q. The fourth bullet point, starting,

1 ROESLER

2 "Is only the second state" --

3 A. -- "to explicitly define conduct
4 by which an out-of-state infringer submits to
5 the jurisdiction of Indiana courts, provides
6 important guidance and choice of law, domicile
7 requirements which case law shows courts
8 generally apply the law of the state where the
9 person was domiciled in death here in New York
10 which does not recognize the decedent's death."

11 Q. What did you mean by that
12 statement?

13 A. That -- I meant that Indiana was an
14 important state to use because it doesn't look
15 to the domicile of where the decedent was
16 domiciled.

17 Q. When you refer to "decedent,"
18 you're referring to Marilyn Monroe?

19 A. That's correct.

20 Q. You say, "apply the law of the
21 state where the person was domiciled at death."
22 That person you're referring to is Marilyn
23 Monroe?

24 A. That's correct.

25 Q. You say "here in New York." Do you

ROESLER

see that?

A. I do.

Q. Do you recall making that statement?

A. I recall -- I mean, I generally recall this document, but -- so I'm sure I made the statement.

Q. Thank you. Do you recall having communications with Larry Shaw back in December of 2006?

A. I don't remember specific dates, but Larry and I talked a lot. Recent --

Q. Do you recall ever stating to Larry that, pursuant to the Indiana statute, Larry and my clients would be responsible for paying CMG's and MMLLC's attorneys' fees in connection with the present litigation?

A. Larry and I had often frequent friendly discussions on the case, and what could and might happen and so forth. And our -- you know, so -- I mean, I -- you know, I think we talked about that there were big legal fees that someone might have to pay. But it was all in a very friendly context.

1 ROESLER

2 Q. Do you recall ever telling Mr.
3 Shaw, Larry Shaw, that if CMG and MMLLC
4 prevailed in this litigation, Larry and my
5 clients would be responsible for paying CMG's
6 and MMLLC's legal fees?

7 MR. MINCH: Objection.

8 Q. Under the Indiana statute.

9 MR. MINCH: Objection.

10 A. I don't -- I don't know that I do
11 recall or don't recall. Like I said, we often
12 talked about the implications of the lawsuit
13 and the costs and so forth. So there may have
14 been something to that effect. But I don't
15 have a specific recollection of it.

16 Q. Let me refresh your recollection.

17 MR. SERBAGI: If you could mark as
18 Roesler 14 a document that we have
19 previously produced in connection with
20 the pleadings in this case. It does not
21 bear a production number. We do have it.
22 It is from Larry Shaw -- no. It is two
23 e-mails, one from Mark Roesler to Larry
24 Shaw and others, and also an e-mail back
25 from -- strike that.